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January 25, 2016

U.S. District Judge Kiyo Matsumoto
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: United States v. Evan Greebel, 15 CR 637 (KAM)

Dear Judge Matsumoto:

On behalf of our client, Evan Greebel, I write to request a modification of Mr. Greebel's current travel restrictions in two respects.

First, we request that Mr. Greebel's permissible travel be expanded to include the State of Connecticut as well as the Eastern and Southern Districts of New York. Mr. Greebel lives in Westchester County, so travel to and through Connecticut is common given the route of regularly traveled roads and highways.

Second, we request that the Court permit Mr. Greebel to travel within the continental United States upon prior notice to the government and Pre-Trial Services ("PTS"). Such notice would include information about his itinerary. We do not think it is necessary to burden the Court with numerous requests for Mr. Greebel to travel for personal or professional reasons. Of course, if the government or PTS objects to particular travel, we will discuss the matter with the government and determine whether the matter should be raised with the Court.

We have advised the assigned prosecutors, Assistant United States Attorneys Winston Paes and Alixandra Smith, of Mr. Greebel's request as set forth above, and they have advised us that the government does not object to Mr. Greebel's request to modify his travel restrictions. We have likewise advised Mr. Vincent Adams of PTS in the Southern District of New York,

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where Mr. Greebel reports, and Mr. Robert Long of PTS in this District, and Messrs. Adams and Long said that PTS as well does not object to this request.

We would be glad to address any concerns the Court has in connection with this matter, and we appreciate the Court's consideration.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'JS Sack', is written over a light blue rectangular background.

Jonathan S. Sack

cc: AUSA Winston Paes, AUSA Alixandra Smith (via ECF)
Mr. Vincent Adams (Pre-trial Services, SDNY)
Mr. Robert Long (Pre-trial Services, EDNY)